

Message

From: EEE [ashley.campsie@eeeng.net]
Sent: 1/18/2018 3:10:40 PM
To: Witosky, Matthew [Witosky.Matthew@epa.gov]
CC: Thompson, Lisa [Thompson.Lisa@epa.gov]; Garwood, Gerri [Garwood.Gerri@epa.gov]
Subject: [SPAM-Sender] RE: NSPS OOOO/OOOOa question concerning Flares

Matthew,

Thank you for the update. No I have not asked any other offices at this point. It is not how we have been interpreting the rule but I was asked to confirm by a client.

Thanks,
Ashley

From: Witosky, Matthew [mailto:Witosky.Matthew@epa.gov]
Sent: Thursday, January 18, 2018 7:27 AM
To: EEE <ashley.campsie@eeeng.net>
Cc: Thompson, Lisa <Thompson.Lisa@epa.gov>; Garwood, Gerri <Garwood.Gerri@epa.gov>
Subject: RE: NSPS OOOO/OOOOa question concerning Flares

Yes, we are discussing it. Have you approached any EPA regional offices with this question?

I am seeking some input from other offices, to verify how the requirements are being applied in the field, before providing a response. I am sorry for the delay.

Thank you,

Matthew

From: EEE [mailto:ashley.campsie@eeeng.net]
Sent: Wednesday, January 17, 2018 7:49 PM
To: Witosky, Matthew <Witosky.Matthew@epa.gov>
Cc: Thompson, Lisa <Thompson.Lisa@epa.gov>; Garwood, Gerri <Garwood.Gerri@epa.gov>
Subject: [SPAM-Sender] RE: NSPS OOOO/OOOOa question concerning Flares

Hi Matthew, just checking in to see if you have had a chance to review the question below.

Thanks,
Ashley

From: EEE [mailto:ashley.campsie@eeeng.net]
Sent: Thursday, January 11, 2018 8:49 AM
To: 'Witosky, Matthew' <Witosky.Matthew@epa.gov>
Cc: 'Thompson, Lisa' <Thompson.Lisa@epa.gov>; 'Garwood, Gerri' <Garwood.Gerri@epa.gov>
Subject: RE: NSPS OOOO/OOOOa question concerning Flares

Matthew,

Thank you for your quick response. A follow up question, if monthly 15 minute Method 22 readings commence upon startup of the control device, is a 2 hour Method 22 reading required for initial compliance also required? Or is the condition below just defining the method that is used to demonstrate compliance (e.g. Method 22 vs. Method 9)?

60.5413(a) *Performance test exemptions.* You are exempt from the requirements to conduct performance tests and design analyses if you use any of the control devices described in paragraphs (a)(1) through (7) of this section.

(1) A flare that is designed and operated in accordance with §60.18(b). You must conduct the compliance determination using Method 22 at 40 CFR part 60, appendix A-7, to determine visible emissions.

Thanks,
Ashley

From: Witosky, Matthew [mailto:Witosky.Matthew@epa.gov]
Sent: Thursday, January 11, 2018 6:34 AM
To: ashley.campsie@eeeng.net
Cc: Thompson, Lisa <Thompson.Lisa@epa.gov>; Garwood, Gerri <Garwood.Gerri@epa.gov>
Subject: NSPS OOOO/OOOOa question concerning Flares

Hi Ms. Campsie,

Thank you for your question. A flare is not considered an enclosed combustion device, but is considered a combustion control device.

You wrote "Specifically, I am trying to determine if the monthly 15 minute Method 22 readings are required for flares controlling storage tanks. "

Yes, flares that are control devices for storage vessels are combustion devices, and are required to comply with 60.5412a(d)(1) (ii) and (iii) as well as 60.5412a(d)(3) and (4).

This also means that flares controlling storage vessels are subject to continuous compliance requirements in 60.5417(h)(1) and (3). 60.5417a(h)(4) does not apply.

Let us know if you have additional questions. Have a great day.

Sincerely,

Matthew Witosky
Fuels and Incineration Group
Sector Policies and Programs Division
Office of Air Quality Planning and Standards
EPA, RTP NC

919-541-2865